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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

D.S., a minor by and through his
guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado; C.S., a minor by
and through his guardian ad litem Elsa
Acosta, individually and as successor-
in-interest to William Salgado; J.S., a
minor by and through her guardian ad
litem Elsa Acosta, individually and as
successor-in-interest to William
Salgado; M.S., a minor by and through
her guardian ad litem Elsa Acosta,
individually and as successor-in-interest
to William Salgado,

Plaintiffs,

v.

CITY OF HUNTINGTON PARK;
NICK NICHOLS; RENE REZA;
MATTHEW RINCON; APRIL
WHEELER; and DOES 5 through 10,
inclusive,

Defendants.

**Case No. 2:23-cv-09412-CBM-AGR
(Consolidated with Case No. 2:24-cv-
04898-CBM-AGR)**

*District Judge Consuelo B. Marshall
Magistrate Judge Alicia G. Rosenberg*

**REQUEST OF PLAINTIFFS'
COUNSEL TO:**

- (1) ALLOW NON-LEAD TRIAL
COUNSEL AT HEARING ON
APPLICATION FOR
APPROVAL OF
COMPROMISE FOR MINOR
PLAINTIFF, O.C.E.; AND**
- (2) REMOTE APPEARANCE OF
PLAINTIFF O.C.E. AND
THEIR GUARDIAN AD
LITEM, EUGENIA
GUADELUPE ESPINOZA
SALMERON**

**[Proposed Order filed concurrently
herewith]**

Hearing date: July 30, 2025

Hearing time: 10:00 am

Courtroom: 8D

1 WILLIAM OMAR CASTILLO
2 MIRANDA, an individual and as
3 Successor in Interest for Decedent,
4 WILLIAM RENE SALGADO
5 MIRANDA; JUANA MARIA
6 MIRANDA, an individual and as
7 Successor in Interest for Decedent,
8 WILLIAM RENE SALGADO
9 MIRANDA; OSMAR ANTONIO
10 CASTILLO BLANDON, a minor by
11 and through Guardian ad litem,
12 EUGENIA GUADELUPE ESPINOZA
13 SALMERON; EUGENIA
14 GUADELUPE ESPINOZA
15 SALMERON, an individual; KARLA
16 VANESSA BLANDON, an individual,

17 Plaintiffs,

18 v.

19 CITY OF HUNTINGTON PARK;
20 RENE REZA, an individual; APRIL
21 WHEELER, an individual; MATTHEW
22 RINCON, an individual; NICK
23 NICHOLS, an individual; JOSE A.
24 YAMASAKI, an individual; SAUL
25 RODRIGUEZ, an individual; and
26 DOES 1 TO 10, inclusive,

27 Defendants.
28

TO THE HONORABLE COURT:

I. INTRODUCTION

Counsel for Plaintiffs respectfully request the Court:

1. Allow Non-Lead Counsel to appear at the hearing for Approval of Minor's Compromise filed on behalf of minor Plaintiff, O.C.E.; and
2. Permit minor Plaintiff, O.C.E. and their *Guardian ad Litem*, EUGENIA GUADELUPE ESPINOZA SALMERON, to appear remotely for the hearing.

II. PLAINTIFFS REQUEST THAT NON-LEAD TRIAL COUNSEL BE PERMITTED TO APPEAR AT THE HEARING TO APPROVE THE MINOR'S COMPROMISE FILED FOR MINOR PLAINTIFF, O.C.E.

Counsel for Plaintiff, O.C.E., by and through their *Guardian ad litem*, EUGENIA GUADELUPE ESPINOZA SALMERON, hereby respectfully request that Kent M. Henderson, Esq. and/or Christopher L. Holm, Esq. be allowed to appear at the upcoming hearing on Plaintiff's *Ex Parte* Application for Approval of Minor's Compromise of the Claims of Minor, O.C.E., in lieu of lead trial counsel, Angel Carrazco, Jr.

This Court's Standing Order reads: "Lead trial counsel shall attend any proceeding before this Court..." (Dkt. 8, ¶2). Lead trial counsel, Angel Carrazco, Jr. is unavailable to attend on the date set by the Court for this hearing due to previously scheduled deposition of a subpoenaed treating doctor (3rd time set) in a state case. Accordingly, Plaintiffs respectfully seek leave to allow either Mr. Henderson or Mr. Holm, both of whom are intimately familiar with the case and the materials submitted to the Court as part of the *ex parte* application that is the subject of the hearing, be allowed to appear instead.

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III. PLAINTIFFS RESPECTFULLY REQUEST THAT MINOR PLAINTIFF, O.C.E. AND THEIR *GUARDIAN AD LITEM*, EUGENIA GUADELUPE ESPINOZA SALMERON, BE PERMITTED TO APEAR REMOTELY AT THE HEARING

Additionally, due to sensitive ongoing concerns of safety, security and transportation of the *Guardian ad Litem*, EUGENIA GUADELUPE ESPINOZA SALMERON, Plaintiffs also respectfully request that minor Plaintiff, O.C.E. and his *Guardian ad Litem*, be permitted to appear remotely for the hearing. If the Court believes that more information is necessary on the details of the request, Plaintiffs' counsel is willing to submit a Declaration for *in camera* review.

IV. CONCLUSION

Plaintiffs' counsel understand the necessity and preference the Court places on having in-person appearances of lead trial counsel in matters before the Court, and apologize for any inconvenience this may cause. However, given that both non-lead counsel have worked extensively on this matter, and specifically with the preparation of the minor's compromise application and documentation, Plaintiffs respectfully request the relief state herein.

Respectfully submitted,

DATED: July 28, 2025

CARRAZCO LAW, A.P.C.

/S/ Christopher L. Holm

By:

Angel Carrazco, Jr.

Kent M. Henderson

Christopher L. Holm

Attorneys for Plaintiffs William Omar

Castillo Miranda, Juana Maria

Miranda, Osmar Antonio Castillo

Blandon, Eugenia Guadalupe Espinoza

Salmeron, and Karla Vanessa Blandon

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

D.S., a minor by and through his guardian ad litem Elsa Acosta, individually and as successor-in-interest to William Salgado; C.S., a minor by and through his guardian ad litem Elsa Acosta, individually and as successor-in-interest to William Salgado; J.S., a minor by and through her guardian ad litem Elsa Acosta, individually and as successor-in-interest to William Salgado; M.S., a minor by and through her guardian ad litem Elsa Acosta, individually and as successor-in-interest to William Salgado,

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[PROPOSED] ORDER

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26 DOES 1 TO 10, inclusive,

27 Defendants.
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[PROPOSED] ORDER

After review of Plaintiffs' Request, in regards to the hearing to the *Ex Parte* Application to Approve Compromise of Claims of Plaintiff, O.C.E., a minor by and through their *Guardian at Litem*, EUGENIA GUADELUPE ESPINOZA SALMERON set for July 30, 2025 at 10:00 am in this Court, and Good Cause having been shown,

IT IS HEREBY ORDERED THAT:

1. Plaintiffs' counsel, either Kent M. Henderson and/or Christopher L. Holm, may appear in lieu of Plaintiffs' lead trial counsel; and
2. Plaintiff, O.C.E., and their *Guardian ad Litem*, EUGENIA GUADELUPE ESPINOZA SALMERON, are both permitted to appear by remote means. Instructions for minor Plaintiff and their *Guardian ad Litem* to be by remote means will be provided by separate communication from the Court.

IT IS SO ORDERED.

Dated: _____

Hon. Consuelo B. Marshall
United States District Judge